



# San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT



MAR 12 2013

Gerardo C. Rios, Chief  
Permits Office  
Air Division  
U.S. EPA - Region IX  
75 Hawthorne St  
San Francisco, CA 94105

Re: **Notice of Minor Title V Permit Modification**  
**District Facility # S-3755**  
**Project # S-1121434**

Dear Mr. Rios:

Enclosed for you to review is an application for minor Title V permit modification for the facility identified above. Seneca Resources is proposing a Title V minor permit modification to incorporate the recently issued Authorities to Construct S-3755-20-2 through '-27-0 into the Title V operating permit. The ATCs authorize new crude oil storage tanks.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued Authorities to Construct S-3755-20-2 through '-27-0, emission increases and application. Please submit your written comments on this project within the 45-day comment period that begins on the date you receive this letter.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Leonard Scandura at (661) 392-5500.

Sincerely,

David Warner  
Director of Permit Services

Enclosures

Seyed Sadredin  
Executive Director/Air Pollution Control Officer

Northern Region  
4800 Enterprise Way  
Modesto, CA 95356-8718  
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)  
1990 E. Gettysburg Avenue  
Fresno, CA 93726-0244  
Tel: (559) 230-6000 FAX: (559) 230-6061

Southern Region  
34946 Flyover Court  
Bakersfield, CA 93308-9725  
Tel: 661-392-5500 FAX: 661-392-5585



# San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT



**MAR 12 2013**

Tim Alburger  
Seneca Resources  
2131 Mars Court  
Bakersfield, CA 93308

**Re: Notice of Minor Title V Permit Modification  
District Facility # S-3755  
Project # S-1121434**

Dear Mr. Alburger:

Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued Authorities to Construct S-3755-20-2 through '-27-0 into the Title V operating permit. The ATCs authorize new crude oil storage tanks.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued Authorities to Construct S-3755-20-2 through '-27-0, emission increases and application. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Leonard Scandura at (661) 392-5500.

Sincerely,

David Warner  
Director of Permit Services

Enclosures

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Executive Director/Air Pollution Control Officer

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Tel: (559) 230-6000 FAX: (559) 230-6061  
[www.valleyair.org](http://www.valleyair.org)

**Southern Region**  
34946 Flyover Court  
Bakersfield, CA 93308-9725  
Tel: 661-392-5500 FAX: 661-392-5585  
[www.healthyliving.com](http://www.healthyliving.com)

## TITLE V APPLICATION REVIEW

Minor Modification  
Project #: S-1121434

Engineer: Robert Rinaldi  
Date: March 1, 2013

Facility Number: S-3755  
Facility Name: Seneca Resources  
Mailing Address: 2131 Mars Court  
Bakersfield, CA 93308

*Reviewed by ASWR AOE*  
MAR 07 2013

Contact Name: Tim Alburger  
Phone: (661) 399-4270

Responsible Official: Brad Elliot  
Title: General Manager, Operations - West Division

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### I. PROPOSAL

Seneca Resources is proposing a Title V minor permit modification to incorporate the recently issued ATCs S-3755-20-2 through '27-0 into the Title V operating permit for new crude oil storage tanks.

The purpose of this evaluation is to identify all applicable requirements, determine if the facility will comply with the applicable requirements and to provide the legal and factual basis for the proposed revisions.

### II. FACILITY LOCATION

The project is located at the Midway-Sunset (South) Maricopa Tank Battery. The location of the tank battery is NW/4 Section 18, Township 11N, Range 23W at Seneca Resources Heavy Oil Western stationary source.

### **III. EQUIPMENT DESCRIPTION**

#### **S-3755-20-2:**

1,500 BBL WELDED FIXED ROOF WASH TANK WITH VAPOR RECOVERY SYSTEM VENTED TO THE CASING GAS GATHERING SYSTEM AND APPROVED INCINERATION DEVICES STEAM GENERATORS S-3755-11, '19, S-1114-113, AND/OR FLARE S-3755-10 AND SERVING TANKS S-3755-21, 22, 23, 24, 25, 26, 27, 28 AND 29

#### **S-3755-21-0:**

1,500 BBL WELDED FIXED ROOF CRUDE OIL STORAGE TANK CONNECTED TO VAPOR RECOVERY SYSTEM LISTED ON S-3755-20

#### **S-3755-22-0:**

1,500 BBL WELDED FIXED ROOF CRUDE OIL STORAGE TANK CONNECTED TO VAPOR RECOVERY SYSTEM LISTED ON S-3755-20

#### **S-3755-23-0:**

1,500 BBL WELDED FIXED ROOF CRUDE OIL STORAGE TANK CONNECTED TO VAPOR RECOVERY SYSTEM LISTED ON S-3755-20

#### **S-3755-24-0:**

600 BBL FWKO UNIT CONNECTED TO VAPOR RECOVERY SYSTEM LISTED ON S-3755-20

#### **S-3755-25-0:**

107 BBL WEMCO UNIT CONNECTED TO VAPOR RECOVERY SYSTEM LISTED ON S-3755-20

**S-3755-26-0:**

1,000 BBL WELDED FIXED ROOF CRUDE OIL STORAGE TANK  
CONNECTED TO VAPOR RECOVERY SYSTEM LISTED ON S-3755-20

**S-3755-27-0:**

600 BBL WELDED FIXED ROOF CLARIFIER TANK CONNECTED TO THE  
VAPOR RECOVERY SYSTEM LISTED ON S-3755-20

**IV. SCOPE OF EPA AND PUBLIC REVIEW**

This change to a Title V permit is considered to be a minor modification and, as such, requires no public review.

**V. APPLICABLE REQUIREMENTS**

District Rule 2520, Federally Mandated Operating Permits (Adopted June 21, 2001)

**VI. DESCRIPTION OF PROPOSED MODIFICATIONS**

ATCs S-3755-20-2 through S-3755-27-0 are new permit units; with no existing Title V PTO being modified. There are no changes to previously approved permit conditions.

## **VII. COMPLIANCE**

In accordance with Rule 2520, 3.20, these modifications:

1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions;
3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
4. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include;
  - a. A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and
  - b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act; and
5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
6. Do not seek to consolidate overlapping applicable requirements.

In accordance with Rule 2520, the application meets the procedural requirements of section 11.4 by including;

1. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
2. The source's suggested draft permit; and
3. Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used.

## **VIII. ATTACHMENTS**

- A. Proposed Title V Operating Permits
- B. Authorities to Construct
- C. Emissions Increases
- D. Application
- E. Compliance Certification Form

# ATTACHMENT A

Proposed Modified Title V Operating Permit No.  
(S-3755-20-3 thru '-27-1)

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-3755-20-3

**EXPIRATION DATE:** 02/29/2016

**SECTION:** NW18 **TOWNSHIP:** 11N **RANGE:** 23W

## **EQUIPMENT DESCRIPTION:**

1,500 BBL WELDED FIXED ROOF WASH TANK WITH VAPOR RECOVERY SYSTEM VENTED TO THE CASING GAS GATHERING SYSTEM AND APPROVED INCINERATION DEVICES STEAM GENERATORS S-3755-11, '19, S-1114-113, AND/OR FLARE S-3755-10 AND SERVING TANKS S-3755-21, 22, 23, 24, 25, 26, 27, 28 AND 29

## **PERMIT UNIT REQUIREMENTS**

1. The VOC content of the gas shall not exceed 10% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Operator shall conduct quarterly gas sampling for gas exiting the separator pressure vessel to qualify for exemption from fugitive component counts for components handling fluids with VOC content equal to or less than 10% by weight. If gas samples are equal to or less than 10% VOC by weight for 8 consecutive quarterly samplings, sampling frequency shall only be required annually. [District Rule 2201] Federally Enforceable Through Title V Permit
3. VOC content of vapor shall be determined by ASTM D1945, ASTM D1946, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The tank shall be equipped with a vapor recovery system consisting of a closed vent system that collects all VOCs from the storage tank, and a VOC control device. The vapor recovery system shall be APCO-approved and maintained in leak-free condition. The VOC control device shall be either of the following: a vapor return or condensation system that connects to a gas pipeline distribution system, or an approved VOC destruction device that reduces the inlet VOC emissions by at least 95% by weight as determined by the test method specified in Section 6.4.6. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
5. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
6. A leak-free condition is defined as a condition without a gas leak or a liquid leak. A gas leak is defined as a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated with methane in accordance with EPA Method 21. A liquid leak is defined as the dripping of organic liquid at a rate of more than 3 drops per minute. [District Rule 4623] Federally Enforceable Through Title V Permit
7. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
8. Except as otherwise provided in this permit, the operator shall ensure that the vapor recovery system is functional and is operating as designed at all times. [District Rules 2201] Federally Enforceable Through Title V Permit
9. All piping, fittings, and valves on this tank shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the leaking provisions of this permit. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE  
These terms and conditions are part of the Facility-wide Permit to Operate.



10. Any component found to be leaking on two consecutive annual inspections is in violation of the District Rule 4623, even if it is under the voluntary inspection and maintenance program. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
11. Operator shall maintain an inspection log containing the following: 1) Type of component leaking; 2) Date and time of leak detection, and method of detection; 3) Date and time of leak repair, and emission level of recheck after leak is repaired; 4) Method used to minimize the leak to lowest possible level within 8 hours after detection. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
12. Operator shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 1070]

These terms and conditions are part of the Facility-wide Permit to Operate.

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# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-3755-21-1

**EXPIRATION DATE:** 02/29/2016

**SECTION:** NW18 **TOWNSHIP:** 11N **RANGE:** 23W

**EQUIPMENT DESCRIPTION:**

1,500 BBL WELDED FIXED ROOF CRUDE OIL STORAGE TANK CONNECTED TO VAPOR RECOVERY SYSTEM  
LISTED ON S-3755-20

## PERMIT UNIT REQUIREMENTS

1. The VOC content of the gas shall not exceed 10% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Operator shall conduct quarterly gas sampling for gas exiting the separator pressure vessel to qualify for exemption from fugitive component counts for components handling fluids with VOC content equal to or less than 10% by weight. If gas samples are equal to or less than 10% VOC by weight for 8 consecutive quarterly samplings, sampling frequency shall only be required annually. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The tank shall be equipped with a vapor control system consisting of a closed vent system that collects all VOCs from the storage tank, and a VOC control device. The vapor control system shall be APCO-approved and maintained in leak-free condition. The efficiency of the vapor control system shall be at least 95%. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
4. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
5. A leak-free condition is defined as a condition without a gas leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
6. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
7. Except as otherwise provided in this permit, the operator shall ensure that the vapor recovery system is functional and is operating as designed at all times. [District Rules 2201] Federally Enforceable Through Title V Permit
8. All piping, fittings, and valves on this tank shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the leaking provisions of this permit. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
9. Any component found to be leaking on two consecutive annual inspections is in violation of the District Rule 4623, even if it is under the voluntary inspection and maintenance program. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
10. VOC content of vapor shall be determined by ASTM D1945, ASTM D1946, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE  
These terms and conditions are part of the Facility-wide Permit to Operate.

11. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date and time of leak detection, and method of detection; 3) Date and time of leak repair, and emission level of recheck after leak is repaired; 4) Method used to minimize the leak to lowest possible level within 8 hours after detection [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
12. Operator shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 1070]

These terms and conditions are part of the Facility-wide Permit to Operate.

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# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-3755-22-1

**EXPIRATION DATE:** 02/29/2016

**SECTION:** NW18 **TOWNSHIP:** 11N **RANGE:** 23W

**EQUIPMENT DESCRIPTION:**

1,500 BBL WELDED FIXED ROOF CRUDE OIL STORAGE TANK CONNECTED TO VAPOR RECOVERY SYSTEM  
LISTED ON S-3755-20

## PERMIT UNIT REQUIREMENTS

1. The VOC content of the gas shall not exceed 10% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Operator shall conduct quarterly gas sampling for gas exiting the separator pressure vessel to qualify for exemption from fugitive component counts for components handling fluids with VOC content equal to or less than 10% by weight. If gas samples are equal to or less than 10% VOC by weight for 8 consecutive quarterly samplings, sampling frequency shall only be required annually. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The tank shall be equipped with a vapor control system consisting of a closed vent system that collects all VOCs from the storage tank, and a VOC control device. The vapor control system shall be APCO-approved and maintained in leak-free condition. The efficiency of the vapor control system shall be at least 95%. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
4. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
5. A leak-free condition is defined as a condition without a gas leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
6. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
7. Except as otherwise provided in this permit, the operator shall ensure that the vapor recovery system is functional and is operating as designed at all times. [District Rules 2201] Federally Enforceable Through Title V Permit
8. All piping, fittings, and valves on this tank shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the leaking provisions of this permit. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
9. Any component found to be leaking on two consecutive annual inspections is in violation of the District Rule 4623, even if it is under the voluntary inspection and maintenance program. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
10. VOC content of vapor shall be determined by ASTM D1945, ASTM D1946, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE  
These terms and conditions are part of the Facility-wide Permit to Operate.

11. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date and time of leak detection, and method of detection; 3) Date and time of leak repair, and emission level of recheck after leak is repaired; 4) Method used to minimize the leak to lowest possible level within 8 hours after detection [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
12. Operator shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 1070] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

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# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-3755-23-1

**EXPIRATION DATE:** 02/29/2016

**SECTION:** NW18 **TOWNSHIP:** 11N **RANGE:** 23W

**EQUIPMENT DESCRIPTION:**

1,500 BBL WELDED FIXED ROOF CRUDE OIL STORAGE TANK CONNECTED TO VAPOR RECOVERY SYSTEM  
LISTED ON S-3755-20

## PERMIT UNIT REQUIREMENTS

1. The VOC content of the gas shall not exceed 10% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Operator shall conduct quarterly gas sampling for gas exiting the separator pressure vessel to qualify for exemption from fugitive component counts for components handling fluids with VOC content equal to or less than 10% by weight. If gas samples are equal to or less than 10% VOC by weight for 8 consecutive quarterly samplings, sampling frequency shall only be required annually. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The tank shall be equipped with a vapor control system consisting of a closed vent system that collects all VOCs from the storage tank, and a VOC control device. The vapor control system shall be APCO-approved and maintained in leak-free condition. The efficiency of the vapor control system shall be at least 95%. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
4. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
5. A leak-free condition is defined as a condition without a gas leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
6. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
7. Except as otherwise provided in this permit, the operator shall ensure that the vapor recovery system is functional and is operating as designed at all times. [District Rules 2201] Federally Enforceable Through Title V Permit
8. All piping, fittings, and valves on this tank shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the leaking provisions of this permit. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
9. Any component found to be leaking on two consecutive annual inspections is in violation of the District Rule 4623, even if it is under the voluntary inspection and maintenance program. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
10. VOC content of vapor shall be determined by ASTM D1945, ASTM D1946, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE  
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11. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date and time of leak detection, and method of detection; 3) Date and time of leak repair, and emission level of recheck after leak is repaired; 4) Method used to minimize the leak to lowest possible level within 8 hours after detection [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
12. Operator shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 1070]

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# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-3755-24-1

**EXPIRATION DATE:** 02/29/2016

**SECTION:** NW18 **TOWNSHIP:** 11N **RANGE:** 23W

**EQUIPMENT DESCRIPTION:**

600 BBL FWKO UNIT CONNECTED TO VAPOR RECOVERY SYSTEM LISTED ON S-3755-20

## PERMIT UNIT REQUIREMENTS

1. The VOC content of the gas shall not exceed 10% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Operator shall conduct quarterly gas sampling for gas exiting the separator pressure vessel to qualify for exemption from fugitive component counts for components handling fluids with VOC content equal to or less than 10% by weight. If gas samples are equal to or less than 10% VOC by weight for 8 consecutive quarterly samplings, sampling frequency shall only be required annually. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The tank shall be equipped with a vapor control system consisting of a closed vent system that collects all VOCs from the storage tank, and a VOC control device. The vapor control system shall be APCO-approved and maintained in leak-free condition. The efficiency of the vapor control system shall be at least 95%. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
4. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
5. A leak-free condition is defined as a condition without a gas leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
6. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
7. Except as otherwise provided in this permit, the operator shall ensure that the vapor recovery system is functional and is operating as designed at all times. [District Rules 2201] Federally Enforceable Through Title V Permit
8. All piping, fittings, and valves on this tank shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the leaking provisions of this permit. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
9. Any component found to be leaking on two consecutive annual inspections is in violation of the District Rule 4623, even if it is under the voluntary inspection and maintenance program. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
10. VOC content of vapor shall be determined by ASTM D1945, ASTM D1946, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE  
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11. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date and time of leak detection, and method of detection; 3) Date and time of leak repair, and emission level of recheck after leak is repaired; 4) Method used to minimize the leak to lowest possible level within 8 hours after detection [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
12. Operator shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 1070]

These terms and conditions are part of the Facility-wide Permit to Operate.

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# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-3755-25-1

**EXPIRATION DATE:** 02/29/2016

**SECTION:** NW18 **TOWNSHIP:** 11N **RANGE:** 23W

**EQUIPMENT DESCRIPTION:**

107 BBL WEMCO UNIT CONNECTED TO VAPOR RECOVERY SYSTEM LISTED ON S-3755-20

## PERMIT UNIT REQUIREMENTS

1. The VOC content of the gas shall not exceed 10% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Operator shall conduct quarterly gas sampling for gas exiting the separator pressure vessel to qualify for exemption from fugitive component counts for components handling fluids with VOC content equal to or less than 10% by weight. If gas samples are equal to or less than 10% VOC by weight for 8 consecutive quarterly samplings, sampling frequency shall only be required annually. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The tank shall be equipped with a vapor control system consisting of a closed vent system that collects all VOCs from the storage tank, and a VOC control device. The vapor control system shall be APCO-approved and maintained in leak-free condition. The efficiency of the vapor control system shall be at least 95%. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
4. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
5. A leak-free condition is defined as a condition without a gas leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
6. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
7. Except as otherwise provided in this permit, the operator shall ensure that the vapor recovery system is functional and is operating as designed at all times. [District Rules 2201] Federally Enforceable Through Title V Permit
8. All piping, fittings, and valves on this tank shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the leaking provisions of this permit. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
9. Any component found to be leaking on two consecutive annual inspections is in violation of the District Rule 4623, even if it is under the voluntary inspection and maintenance program. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
10. VOC content of vapor shall be determined by ASTM D1945, ASTM D1946, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE  
These terms and conditions are part of the Facility-wide Permit to Operate.

11. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date and time of leak detection, and method of detection; 3) Date and time of leak repair, and emission level of recheck after leak is repaired; 4) Method used to minimize the leak to lowest possible level within 8 hours after detection [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
12. Operator shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 1070]

These terms and conditions are part of the Facility-wide Permit to Operate.

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# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-3755-26-1

**EXPIRATION DATE:** 02/29/2016

**SECTION:** NW18 **TOWNSHIP:** 11N **RANGE:** 23W

**EQUIPMENT DESCRIPTION:**

1,000 BBL WELDED FIXED ROOF CRUDE OIL STORAGE TANK CONNECTED TO VAPOR RECOVERY SYSTEM  
LISTED ON S-3755-20

## PERMIT UNIT REQUIREMENTS

1. The VOC content of the gas shall not exceed 10% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Operator shall conduct quarterly gas sampling for gas exiting the separator pressure vessel to qualify for exemption from fugitive component counts for components handling fluids with VOC content equal to or less than 10% by weight. If gas samples are equal to or less than 10% VOC by weight for 8 consecutive quarterly samplings, sampling frequency shall only be required annually. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The tank shall be equipped with a vapor control system consisting of a closed vent system that collects all VOCs from the storage tank, and a VOC control device. The vapor control system shall be APCO-approved and maintained in leak-free condition. The efficiency of the vapor control system shall be at least 95%. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
4. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
5. A leak-free condition is defined as a condition without a gas leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
6. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
7. Except as otherwise provided in this permit, the operator shall ensure that the vapor recovery system is functional and is operating as designed at all times. [District Rules 2201] Federally Enforceable Through Title V Permit
8. All piping, fittings, and valves on this tank shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the leaking provisions of this permit. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
9. Any component found to be leaking on two consecutive annual inspections is in violation of the District Rule 4623, even if it is under the voluntary inspection and maintenance program. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
10. VOC content of vapor shall be determined by ASTM D1945, ASTM D1946, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE  
These terms and conditions are part of the Facility-wide Permit to Operate.

11. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date and time of leak detection, and method of detection; 3) Date and time of leak repair, and emission level of recheck after leak is repaired; 4) Method used to minimize the leak to lowest possible level within 8 hours after detection [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
12. Operator shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 1070]

These terms and conditions are part of the Facility-wide Permit to Operate.

DRAFT

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-3755-27-1

**EXPIRATION DATE:** 02/29/2016

**SECTION:** NW18 **TOWNSHIP:** 11N **RANGE:** 23W

**EQUIPMENT DESCRIPTION:**

600 BBL WELDED FIXED ROOF CLARIFIER TANK CONNECTED TO THE VAPOR RECOVERY SYSTEM LISTED ON S-3755-20

## PERMIT UNIT REQUIREMENTS

1. The VOC content of the gas shall not exceed 10% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Operator shall conduct quarterly gas sampling for gas exiting the separator pressure vessel to qualify for exemption from fugitive component counts for components handling fluids with VOC content equal to or less than 10% by weight. If gas samples are equal to or less than 10% VOC by weight for 8 consecutive quarterly samplings, sampling frequency shall only be required annually. [District Rule 2201] Federally Enforceable Through Title V Permit
3. VOC content of vapor shall be determined by ASTM D1945, ASTM D1946, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Permittee shall maintain a written record of VOC content of the gas and shall make such records available for District inspection upon request for a period of five years. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The tank shall be equipped with a vapor recovery system consisting of a closed vent system that collects all VOCs from the storage tank, and a VOC control device. The vapor recovery system shall be APCO-approved and maintained in leak-free condition. The VOC control device shall be either of the following: a vapor return or condensation system that connects to a gas pipeline distribution system, or an approved VOC destruction device that reduces the inlet VOC emissions by at least 95% by weight as determined by the test method specified in Section 6.4.6. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Except as otherwise provided in this permit, the operator shall ensure that the vapor recovery system is functional and is operating as designed at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
7. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rule 2201] Federally Enforceable Through Title V Permit
8. A leak-free condition is defined as a condition without a gas leak or a liquid leak. A gas leak is defined as a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated with methane in accordance with EPA Method 21. A liquid leak is defined as the dripping of organic liquid at a rate of more than 3 drops per minute. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE  
These terms and conditions are part of the Facility-wide Permit to Operate.

10. Operator shall visually inspect tank shell, hatches, seals, seams, cable seals, valves, flanges, connectors, and any other piping components directly affixed to the tank and within five feet of the tank at least once per year for liquid leaks, and with a portable hydrocarbon detection instrument conducted in accordance with EPA Method 21 for gas leaks. Operator shall also visually or ultrasonically inspect as appropriate, the external shells and roofs of uninsulated tanks for structural integrity annually. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Upon detection of a liquid leak, defined as a leak rate of greater than or equal to 30 drops per minute, operator shall repair the leak within 8 hours. For leaks with a liquid leak rate of between 3 and 30 drops per minute, the leaking component shall be repaired within 24 hours after detection. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Upon detection of a gas leak, defined as a VOC concentration of greater than 10,000 ppmv measured in accordance with EPA Method 21, operator shall take one of the following actions: 1) eliminate the leak within 8 hours after detection; or 2) if the leak cannot be eliminated, then minimize the leak to the lowest possible level within 8 hours after detection by using best maintenance practices, and eliminate the leak within 48 hours after minimization. In no event shall the total time to minimize and eliminate a leak exceed 56 hours after detection. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Components found to be leaking either liquids or gases shall be immediately affixed with a tag showing the component to be leaking. Operator shall maintain records of the liquid or gas leak detection readings, date/time the leak was discovered, and date/time the component was repaired to a leak-free condition. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Leaking components that have been discovered by the operator that have been immediately tagged and repaired within the timeframes specified in District Rule 4623, Table 3 shall not constitute a violation of this rule. Leaking components as defined by District Rule 4623 discovered by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within the timeframes specified in District Rule 4623, Table 3 shall constitute a violation of this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
15. If a component type for a given tank is found to leak during an annual inspection, operator shall conduct quarterly inspections of that component type on the tank or tank system for four consecutive quarters. If no components are found to leak after four consecutive quarters, the operator may revert to annual inspections. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Any component found to be leaking on two consecutive annual inspections is in violation of this permit, even if covered under the voluntary inspection and maintenance program. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Operator shall maintain an inspection log containing the following: 1) Type of component leaking; 2) Date and time of leak detection, and method of detection; 3) Date and time of leak repair, and emission level of recheck after leak is repaired; 4) Method used to minimize the leak to lowest possible level within 8 hours after detection. [District Rule 2201] Federally Enforceable Through Title V Permit
18. All records required to be maintained by this permit shall be maintained for a period of at least five years and shall be made readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

# ATTACHMENT B

Authorities to Construct No.  
(S-3755-20-2 thru '-27-0)





## AUTHORITY TO CONSTRUCT

**PERMIT NO:** S-3755-20-2

**ISSUANCE DATE:** 05/15/2012

**LEGAL OWNER OR OPERATOR:** SENECA RESOURCES  
**MAILING ADDRESS:** 2131 MARS COURT  
BAKERSFIELD, CA 93308

**LOCATION:** HEAVY OIL WESTERN

**SECTION:** NW18 **TOWNSHIP:** 11N **RANGE:** 23W

### EQUIPMENT DESCRIPTION:

MODIFICATION OF A 1,500 BBL WELDED FIXED ROOF WASH TANK WITH VAPOR RECOVERY SYSTEM VENTED TO THE CASING GAS GATHERING SYSTEM AND APPROVED INCINERATION DEVICES STEAM GENERATORS S-3755-11, '19, S-1114-113, AND/OR FLARE S-3755-10 AND SERVING TANKS S-3755-21, 22, 23, 24, 25, 26, AND 27: CONNECT VAPOR RECOVERY SYSTEM TO 500 BBL PRODUCED WATER TANK S-3755-28 AND 500 BBL SAND DUMP TANK S-3755-29

## CONDITIONS

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. Within 90 days of startup of the equipment authorized by this Authority to Construct, Permits to Operate S-3755-6, '7, '8, and '9 shall be surrendered to the District and the associated equipment shall be removed or rendered inoperable. [District Rule 2201] ✓ *(Os in process)*
3. This Authority to Construct (ATC) shall be implemented concurrently with or subsequently to ATCs S-3755-20-0 and S-3755-20-1. [District Rule 2201] ✓
4. Authority to Construct (ATC) S-1114-113-0 shall be implemented concurrently, or prior to the modification and startup of the equipment authorized by this Authority to Construct. [District Rule 2201] ✓
5. The VOC content of the gas shall not exceed 10% by weight. [District Rule 2201]
6. Operator shall conduct quarterly gas sampling for gas exiting the separator pressure vessel to qualify for exemption from fugitive component counts for components handling fluids with VOC content equal to or less than 10% by weight. If gas samples are equal to or less than 10% VOC by weight for 8 consecutive quarterly samplings, sampling frequency shall only be required annually. [District Rule 2201]

CONDITIONS CONTINUE ON NEXT PAGE

**YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT.** This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

DAVID WARNER, Director of Permit Services

S-3755-20-2 : Mar 7 2013 10:07AM - RINALDIR : Joint Inspection NOT Required

7. VOC content of vapor shall be determined by ASTM D1945, ASTM D1946, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201]
8. The tank shall be equipped with a vapor recovery system consisting of a closed vent system that collects all VOCs from the storage tank, and a VOC control device. The vapor recovery system shall be APCO-approved and maintained in leak-free condition. The VOC control device shall be either of the following: a vapor return or condensation system that connects to a gas pipeline distribution system, or an approved VOC destruction device that reduces the inlet VOC emissions by at least 95% by weight as determined by the test method specified in Section 6.4.6. [District Rules 2201 and 4623]
9. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rules 2201 and 4623]
10. A leak-free condition is defined as a condition without a gas leak or a liquid leak. A gas leak is defined as a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated with methane in accordance with EPA Method 21. A liquid leak is defined as the dripping of organic liquid at a rate of more than 3 drops per minute. [District Rule 4623]
11. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rules 2201 and 4623]
12. Except as otherwise provided in this permit, the operator shall ensure that the vapor recovery system is functional and is operating as designed at all times. [District Rules 2201]
13. All piping, fittings, and valves on this tank shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the leaking provisions of this permit. [District Rules 2201 and 4623]
14. Any component found to be leaking on two consecutive annual inspections is in violation of the District Rule 4623, even if it is under the voluntary inspection and maintenance program. [District Rules 2201 and 4623]
15. Operator shall maintain an inspection log containing the following: 1) Type of component leaking; 2) Date and time of leak detection, and method of detection; 3) Date and time of leak repair, and emission level of recheck after leak is repaired; 4) Method used to minimize the leak to lowest possible level within 8 hours after detection. [District Rules 2201 and 4623]
16. Operator shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 1070]



## AUTHORITY TO CONSTRUCT

**PERMIT NO:** S-3755-21-0

**ISSUANCE DATE:** 02/04/2011

**LEGAL OWNER OR OPERATOR:** SENECA RESOURCES  
**MAILING ADDRESS:** 2131 MARS COURT  
BAKERSFIELD, CA 93308

**LOCATION:** HEAVY OIL WESTERN

**SECTION:** NW18 **TOWNSHIP:** 11N **RANGE:** 23W

**EQUIPMENT DESCRIPTION:**

1,500 BBL WELDED FIXED ROOF CRUDE OIL STORAGE TANK CONNECTED TO VAPOR RECOVERY SYSTEM  
LISTED ON S-3755-20

## CONDITIONS

1. Within 90 days of startup of the equipment authorized by this Authority to Construct, Permits to Operate S-3755-6, '7, '8, and '9 shall be surrendered to the District and the associated equipment shall be removed or rendered inoperable. [District Rule 2201] ✓
2. The VOC content of the gas shall not exceed 10% by weight. [District Rule 2201]
3. Operator shall conduct quarterly gas sampling for gas exiting the separator pressure vessel to qualify for exemption from fugitive component counts for components handling fluids with VOC content equal to or less than 10% by weight. If gas samples are equal to or less than 10% VOC by weight for 8 consecutive quarterly samplings, sampling frequency shall only be required annually. [District Rule 2201]
4. The tank shall be equipped with a vapor control system consisting of a closed vent system that collects all VOCs from the storage tank, and a VOC control device. The vapor control system shall be APCO-approved and maintained in leak-free condition. The efficiency of the vapor control system shall be at least 95%. [District Rules 2201 and 4623]
5. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rules 2201 and 4623]

CONDITIONS CONTINUE ON NEXT PAGE

**YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT.** This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

6. A leak-free condition is defined as a condition without a gas leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rules 2201 and 4623]
7. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rules 2201 and 4623]
8. Except as otherwise provided in this permit, the operator shall ensure that the vapor recovery system is functional and is operating as designed at all times. [District Rules 2201]
9. All piping, fittings, and valves on this tank shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the leaking provisions of this permit. [District Rules 2201 and 4623]
10. Any component found to be leaking on two consecutive annual inspections is in violation of the District Rule 4623, even if it is under the voluntary inspection and maintenance program. [District Rules 2201 and 4623]
11. VOC content of vapor shall be determined by ASTM D1945, ASTM D1946, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201]
12. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date and time of leak detection, and method of detection; 3) Date and time of leak repair, and emission level of recheck after leak is repaired; 4) Method used to minimize the leak to lowest possible level within 8 hours after detection [District Rules 2201 and 4623]
13. Operator shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 1070]



## AUTHORITY TO CONSTRUCT

**PERMIT NO:** S-3755-22-0

**ISSUANCE DATE:** 02/04/2011

**LEGAL OWNER OR OPERATOR:** SENECA RESOURCES  
**MAILING ADDRESS:** 2131 MARS COURT  
BAKERSFIELD, CA 93308

**LOCATION:** HEAVY OIL WESTERN

**SECTION:** NW18 **TOWNSHIP:** 11N **RANGE:** 23W

**EQUIPMENT DESCRIPTION:**  
1,500 BBL WELDED FIXED ROOF CRUDE OIL STORAGE TANK CONNECTED TO VAPOR RECOVERY SYSTEM  
LISTED ON S-3755-20

## CONDITIONS

1. Within 90 days of startup of the equipment authorized by this Authority to Construct, Permits to Operate S-3755-6, '7, '8, and '9 shall be surrendered to the District and the associated equipment shall be removed or rendered inoperable. [District Rule 2201] ✓
2. The VOC content of the gas shall not exceed 10% by weight. [District Rule 2201]
3. Operator shall conduct quarterly gas sampling for gas exiting the separator pressure vessel to qualify for exemption from fugitive component counts for components handling fluids with VOC content equal to or less than 10% by weight. If gas samples are equal to or less than 10% VOC by weight for 8 consecutive quarterly samplings, sampling frequency shall only be required annually. [District Rule 2201]
4. The tank shall be equipped with a vapor control system consisting of a closed vent system that collects all VOCs from the storage tank, and a VOC control device. The vapor control system shall be APCO-approved and maintained in leak-free condition. The efficiency of the vapor control system shall be at least 95%. [District Rules 2201 and 4623]
5. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rules 2201 and 4623]

CONDITIONS CONTINUE ON NEXT PAGE

**YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT.** This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

DAVID WARNER, Director of Permit Services

S-3755-22-0 : Mar 7 2013 10:07AM -- RINALDIR : Joint Inspection NOT Required

6. A leak-free condition is defined as a condition without a gas leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rules 2201 and 4623]
7. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rules 2201 and 4623]
8. Except as otherwise provided in this permit, the operator shall ensure that the vapor recovery system is functional and is operating as designed at all times. [District Rules 2201]
9. All piping, fittings, and valves on this tank shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the leaking provisions of this permit. [District Rules 2201 and 4623]
10. Any component found to be leaking on two consecutive annual inspections is in violation of the District Rule 4623, even if it is under the voluntary inspection and maintenance program. [District Rules 2201 and 4623]
11. VOC content of vapor shall be determined by ASTM D1945, ASTM D1946, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201]
12. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date and time of leak detection, and method of detection; 3) Date and time of leak repair, and emission level of recheck after leak is repaired; 4) Method used to minimize the leak to lowest possible level within 8 hours after detection [District Rules 2201 and 4623]
13. Operator shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 1070]



## AUTHORITY TO CONSTRUCT

**PERMIT NO:** S-3755-23-0

**ISSUANCE DATE:** 02/04/2011

**LEGAL OWNER OR OPERATOR:** SENECA RESOURCES  
**MAILING ADDRESS:** 2131 MARS COURT  
BAKERSFIELD, CA 93308

**LOCATION:** HEAVY OIL WESTERN

**SECTION:** NW18 **TOWNSHIP:** 11N **RANGE:** 23W

**EQUIPMENT DESCRIPTION:**  
1,500 BBL WELDED FIXED ROOF CRUDE OIL STORAGE TANK CONNECTED TO VAPOR RECOVERY SYSTEM  
LISTED ON S-3755-20

## CONDITIONS

1. Within 90 days of startup of the equipment authorized by this Authority to Construct, Permits to Operate S-3755-6, '7, '8, and '9 shall be surrendered to the District and the associated equipment shall be removed or rendered inoperable. [District Rule 2201] ✓
2. The VOC content of the gas shall not exceed 10% by weight. [District Rule 2201]
3. Operator shall conduct quarterly gas sampling for gas exiting the separator pressure vessel to qualify for exemption from fugitive component counts for components handling fluids with VOC content equal to or less than 10% by weight. If gas samples are equal to or less than 10% VOC by weight for 8 consecutive quarterly samplings, sampling frequency shall only be required annually. [District Rule 2201]
4. The tank shall be equipped with a vapor control system consisting of a closed vent system that collects all VOCs from the storage tank, and a VOC control device. The vapor control system shall be APCO-approved and maintained in leak-free condition. The efficiency of the vapor control system shall be at least 95%. [District Rules 2201 and 4623]
5. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rules 2201 and 4623]

CONDITIONS CONTINUE ON NEXT PAGE

**YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT.** This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

6. A leak-free condition is defined as a condition without a gas leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rules 2201 and 4623]
7. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rules 2201 and 4623]
8. Except as otherwise provided in this permit, the operator shall ensure that the vapor recovery system is functional and is operating as designed at all times. [District Rules 2201]
9. All piping, fittings, and valves on this tank shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the leaking provisions of this permit. [District Rules 2201 and 4623]
10. Any component found to be leaking on two consecutive annual inspections is in violation of the District Rule 4623, even if it is under the voluntary inspection and maintenance program. [District Rules 2201 and 4623]
11. VOC content of vapor shall be determined by ASTM D1945, ASTM D1946, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201]
12. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date and time of leak detection, and method of detection; 3) Date and time of leak repair, and emission level of recheck after leak is repaired; 4) Method used to minimize the leak to lowest possible level within 8 hours after detection [District Rules 2201 and 4623]
13. Operator shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 1070]





## AUTHORITY TO CONSTRUCT

**PERMIT NO:** S-3755-24-0

**ISSUANCE DATE:** 02/04/2011

**LEGAL OWNER OR OPERATOR:** SENECA RESOURCES  
**MAILING ADDRESS:** 2131 MARS COURT  
BAKERSFIELD, CA 93308

**LOCATION:** HEAVY OIL WESTERN

**SECTION:** NW18 **TOWNSHIP:** 11N **RANGE:** 23W

**EQUIPMENT DESCRIPTION:**  
600 BBL FWKO UNIT CONNECTED TO VAPOR RECOVERY SYSTEM LISTED ON S-3755-20

## CONDITIONS

1. Within 90 days of startup of the equipment authorized by this Authority to Construct, Permits to Operate S-3755-6, '7, '8, and '9 shall be surrendered to the District and the associated equipment shall be removed or rendered inoperable. [District Rule 2201] ✓
2. The VOC content of the gas shall not exceed 10% by weight. [District Rule 2201]
3. Operator shall conduct quarterly gas sampling for gas exiting the separator pressure vessel to qualify for exemption from fugitive component counts for components handling fluids with VOC content equal to or less than 10% by weight. If gas samples are equal to or less than 10% VOC by weight for 8 consecutive quarterly samplings, sampling frequency shall only be required annually. [District Rule 2201]
4. The tank shall be equipped with a vapor control system consisting of a closed vent system that collects all VOCs from the storage tank, and a VOC control device. The vapor control system shall be APCO-approved and maintained in leak-free condition. The efficiency of the vapor control system shall be at least 95%. [District Rules 2201 and 4623]
5. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rules 2201 and 4623]
6. A leak-free condition is defined as a condition without a gas leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rules 2201 and 4623]

CONDITIONS CONTINUE ON NEXT PAGE

**YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT.** This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

7. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rules 2201 and 4623]
8. Except as otherwise provided in this permit, the operator shall ensure that the vapor recovery system is functional and is operating as designed at all times. [District Rules 2201]
9. All piping, fittings, and valves on this tank shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the leaking provisions of this permit. [District Rules 2201 and 4623]
10. Any component found to be leaking on two consecutive annual inspections is in violation of the District Rule 4623, even if it is under the voluntary inspection and maintenance program. [District Rules 2201 and 4623]
11. VOC content of vapor shall be determined by ASTM D1945, ASTM D1946, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201]
12. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date and time of leak detection, and method of detection; 3) Date and time of leak repair, and emission level of recheck after leak is repaired; 4) Method used to minimize the leak to lowest possible level within 8 hours after detection [District Rules 2201 and 4623]
13. Operator shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 1070]



## AUTHORITY TO CONSTRUCT

**PERMIT NO:** S-3755-25-0

**ISSUANCE DATE:** 02/04/2011

**LEGAL OWNER OR OPERATOR:** SENECA RESOURCES  
**MAILING ADDRESS:** 2131 MARS COURT  
BAKERSFIELD, CA 93308

**LOCATION:** HEAVY OIL WESTERN

**SECTION:** NW18 **TOWNSHIP:** 11N **RANGE:** 23W

**EQUIPMENT DESCRIPTION:**  
107 BBL WEMCO UNIT CONNECTED TO VAPOR RECOVERY SYSTEM LISTED ON S-3755-20

## CONDITIONS

1. Within 90 days of startup of the equipment authorized by this Authority to Construct, Permits to Operate S-3755-6, '7, '8, and '9 shall be surrendered to the District and the associated equipment shall be removed or rendered inoperable. [District Rule 2201] ✓
2. The VOC content of the gas shall not exceed 10% by weight. [District Rule 2201]
3. Operator shall conduct quarterly gas sampling for gas exiting the separator pressure vessel to qualify for exemption from fugitive component counts for components handling fluids with VOC content equal to or less than 10% by weight. If gas samples are equal to or less than 10% VOC by weight for 8 consecutive quarterly samplings, sampling frequency shall only be required annually. [District Rule 2201]
4. The tank shall be equipped with a vapor control system consisting of a closed vent system that collects all VOCs from the storage tank, and a VOC control device. The vapor control system shall be APCO-approved and maintained in leak-free condition. The efficiency of the vapor control system shall be at least 95%. [District Rules 2201 and 4623]
5. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rules 2201 and 4623]
6. A leak-free condition is defined as a condition without a gas leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rules 2201 and 4623]

CONDITIONS CONTINUE ON NEXT PAGE

YOU **MUST** NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

7. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rules 2201 and 4623]
8. Except as otherwise provided in this permit, the operator shall ensure that the vapor recovery system is functional and is operating as designed at all times. [District Rules 2201]
9. All piping, fittings, and valves on this tank shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the leaking provisions of this permit. [District Rules 2201 and 4623]
10. Any component found to be leaking on two consecutive annual inspections is in violation of the District Rule 4623, even if it is under the voluntary inspection and maintenance program. [District Rules 2201 and 4623]
11. VOC content of vapor shall be determined by ASTM D1945, ASTM D1946, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201]
12. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date and time of leak detection, and method of detection; 3) Date and time of leak repair, and emission level of recheck after leak is repaired; 4) Method used to minimize the leak to lowest possible level within 8 hours after detection [District Rules 2201 and 4623]
13. Operator shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 1070]



## AUTHORITY TO CONSTRUCT

**PERMIT NO:** S-3755-26-0

**ISSUANCE DATE:** 02/04/2011

**LEGAL OWNER OR OPERATOR:** SENECA RESOURCES  
**MAILING ADDRESS:** 2131 MARS COURT  
BAKERSFIELD, CA 93308

**LOCATION:** HEAVY OIL WESTERN

**SECTION:** NW18 **TOWNSHIP:** 11N **RANGE:** 23W

**EQUIPMENT DESCRIPTION:**  
1,000 BBL WELDED FIXED ROOF CRUDE OIL STORAGE TANK CONNECTED TO VAPOR RECOVERY SYSTEM  
LISTED ON S-3755-20

## CONDITIONS

1. Within 90 days of startup of the equipment authorized by this Authority to Construct, Permits to Operate S-3755-6, '7, '8, and '9 shall be surrendered to the District and the associated equipment shall be removed or rendered inoperable. [District Rule 2201] ✓
2. The VOC content of the gas shall not exceed 10% by weight. [District Rule 2201]
3. Operator shall conduct quarterly gas sampling for gas exiting the separator pressure vessel to qualify for exemption from fugitive component counts for components handling fluids with VOC content equal to or less than 10% by weight. If gas samples are equal to or less than 10% VOC by weight for 8 consecutive quarterly samplings, sampling frequency shall only be required annually. [District Rule 2201]
4. The tank shall be equipped with a vapor control system consisting of a closed vent system that collects all VOCs from the storage tank, and a VOC control device. The vapor control system shall be APCO-approved and maintained in leak-free condition. The efficiency of the vapor control system shall be at least 95%. [District Rules 2201 and 4623]
5. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rules 2201 and 4623]

CONDITIONS CONTINUE ON NEXT PAGE

**YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT.** This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

DAVID WARNER, Director of Permit Services

S-3755-26-0 : Mar 7 2013 10:08AM -- RINALDIR : Joint Inspection NOT Required

6. A leak-free condition is defined as a condition without a gas leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rules 2201 and 4623]
7. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rules 2201 and 4623]
8. Except as otherwise provided in this permit, the operator shall ensure that the vapor recovery system is functional and is operating as designed at all times. [District Rules 2201]
9. All piping, fittings, and valves on this tank shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the leaking provisions of this permit. [District Rules 2201 and 4623]
10. Any component found to be leaking on two consecutive annual inspections is in violation of the District Rule 4623, even if it is under the voluntary inspection and maintenance program. [District Rules 2201 and 4623]
11. VOC content of vapor shall be determined by ASTM D1945, ASTM D1946, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201]
12. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date and time of leak detection, and method of detection; 3) Date and time of leak repair, and emission level of recheck after leak is repaired; 4) Method used to minimize the leak to lowest possible level within 8 hours after detection [District Rules 2201 and 4623]
13. Operator shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 1070]



## AUTHORITY TO CONSTRUCT

**PERMIT NO:** S-3755-27-0

**ISSUANCE DATE:** 02/04/2011

**LEGAL OWNER OR OPERATOR:** SENECA RESOURCES  
**MAILING ADDRESS:** 2131 MARS COURT  
BAKERSFIELD, CA 93308

**LOCATION:** HEAVY OIL WESTERN

**SECTION:** NW18 **TOWNSHIP:** 11N **RANGE:** 23W

**EQUIPMENT DESCRIPTION:**

600 BBL WELDED FIXED ROOF CLARIFIER TANK CONNECTED TO THE VAPOR RECOVERY SYSTEM LISTED ON S-3755-20

## CONDITIONS

1. This Authority to Construct (ATC) shall be implemented concurrently with ATC S-3755-20-1. [District Rule 2201]
2. The VOC content of the gas shall not exceed 10% by weight. [District Rule 2201]
3. Operator shall conduct quarterly gas sampling for gas exiting the separator pressure vessel to qualify for exemption from fugitive component counts for components handling fluids with VOC content equal to or less than 10% by weight. If gas samples are equal to or less than 10% VOC by weight for 8 consecutive quarterly samplings, sampling frequency shall only be required annually. [District Rule 2201]
4. VOC content of vapor shall be determined by ASTM D1945, ASTM D1946, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201]
5. Permittee shall maintain a written record of VOC content of the gas and shall make such records available for District inspection upon request for a period of five years. [District Rule 2201]
6. The tank shall be equipped with a vapor recovery system consisting of a closed vent system that collects all VOCs from the storage tank, and a VOC control device. The vapor recovery system shall be APCO-approved and maintained in leak-free condition. The VOC control device shall be either of the following: a vapor return or condensation system that connects to a gas pipeline distribution system, or an approved VOC destruction device that reduces the inlet VOC emissions by at least 95% by weight as determined by the test method specified in Section 6.4.6. [District Rule 2201]

CONDITIONS CONTINUE ON NEXT PAGE

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Seyed Sadredin, Executive Director / APCO

7. Except as otherwise provided in this permit, the operator shall ensure that the vapor recovery system is functional and is operating as designed at all times. [District Rule 2201]
8. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rule 2201]
9. A leak-free condition is defined as a condition without a gas leak or a liquid leak. A gas leak is defined as a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated with methane in accordance with EPA Method 21. A liquid leak is defined as the dripping of organic liquid at a rate of more than 3 drops per minute. [District Rule 2201]
10. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rule 2201]
11. Operator shall visually inspect tank shell, hatches, seals, seams, cable seals, valves, flanges, connectors, and any other piping components directly affixed to the tank and within five feet of the tank at least once per year for liquid leaks, and with a portable hydrocarbon detection instrument conducted in accordance with EPA Method 21 for gas leaks. Operator shall also visually or ultrasonically inspect as appropriate, the external shells and roofs of uninsulated tanks for structural integrity annually. [District Rule 2201]
12. Upon detection of a liquid leak, defined as a leak rate of greater than or equal to 30 drops per minute, operator shall repair the leak within 8 hours. For leaks with a liquid leak rate of between 3 and 30 drops per minute, the leaking component shall be repaired within 24 hours after detection. [District Rule 2201]
13. Upon detection of a gas leak, defined as a VOC concentration of greater than 10,000 ppmv measured in accordance with EPA Method 21, operator shall take one of the following actions: 1) eliminate the leak within 8 hours after detection; or 2) if the leak cannot be eliminated, then minimize the leak to the lowest possible level within 8 hours after detection by using best maintenance practices, and eliminate the leak within 48 hours after minimization. In no event shall the total time to minimize and eliminate a leak exceed 56 hours after detection. [District Rule 2201]
14. Components found to be leaking either liquids or gases shall be immediately affixed with a tag showing the component to be leaking. Operator shall maintain records of the liquid or gas leak detection readings, date/time the leak was discovered, and date/time the component was repaired to a leak-free condition. [District Rule 2201]
15. Leaking components that have been discovered by the operator that have been immediately tagged and repaired within the timeframes specified in District Rule 4623, Table 3 shall not constitute a violation of this rule. Leaking components as defined by District Rule 4623 discovered by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within the timeframes specified in District Rule 4623, Table 3 shall constitute a violation of this permit. [District Rule 2201]
16. If a component type for a given tank is found to leak during an annual inspection, operator shall conduct quarterly inspections of that component type on the tank or tank system for four consecutive quarters. If no components are found to leak after four consecutive quarters, the operator may revert to annual inspections. [District Rule 2201]
17. Any component found to be leaking on two consecutive annual inspections is in violation of this permit, even if covered under the voluntary inspection and maintenance program. [District Rule 2201]
18. Operator shall maintain an inspection log containing the following: 1) Type of component leaking; 2) Date and time of leak detection, and method of detection; 3) Date and time of leak repair, and emission level of recheck after leak is repaired; 4) Method used to minimize the leak to lowest possible level within 8 hours after detection. [District Rule 2201]
19. All records required to be maintained by this permit shall be maintained for a period of at least five years and shall be made readily available for District inspection upon request. [District Rule 2201]



# ATTACHMENT C

## Emissions Increases

	SSIPE (lb/yr)				
	NOx	VOC	CO	SOx	PM10
S-3755-20-2	0	0	0	0	0
S-3755-21-0	0	0	0	0	0
S-3755-22-0	0	0	0	0	0
S-3755-23-0	0	0	0	0	0
S-3755-24-0	0	0	0	0	0
S-3755-25-0	0	0	0	0	0
S-3755-26-0	0	0	0	0	0
S-3755-27-0	0	0	0	0	0
<b>TOTAL</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

# ATTACHMENT D

Application

# San Joaquin Valley Air Pollution Control District

www.valleyair.org

5-3755-20-3, 121-1, 1442, 127-1  
**RECEIVED**  
**RECEIVED**  
**MAY 07 2012**  
**SJVAPCD**  
**Southern Region**

## Permit Application For:

[ ] ADMINISTRATIVE AMENDMENT [X] MINOR MODIFICATION [ ] SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: Seneca Resources	
2. MAILING ADDRESS:	
STREET/P.O. BOX: 2131 Mars Court	
CITY: Bakersfield	STATE: CA
9-DIGIT ZIP CODE: 93308	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED:	INSTALLATION DATE: The tank battery is still under construction.
STREET: 25032 Western Minerals Road	CITY: Maricopa, South Midway-Sunset Field
1/4 SECTION 18 TOWNSHIP 11N RANGE 23W	
4. GENERAL NATURE OF BUSINESS: Oil-gas exploration and production	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) Refer to the cover letter.	
6. TYPE OR PRINT NAME OF APPLICANT: Timothy R. Alburger	TITLE OF APPLICANT: EHS Manager
7. SIGNATURE OF APPLICANT:	DATE: 05.07.12
PHONE: (661) 399.4270, ext. 3544	
FAX: (661) 399.7706	
EMAIL: alburgert@srcx.com	

### For APCD Use Only:

DATE STAMP	FILING FEE RECEIVED: \$	CHECK#:
	DATE PAID:	
	PROJECT NO: S1121434	FACILITY ID: S-3755

*Title V - Minor Mod*

# ATTACHMENT E

## Compliance Certification Form

**San Joaquin Valley  
Unified Air Pollution Control District**

**TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM**

**I. TYPE OF PERMIT ACTION** (Check appropriate box)

☐ SIGNIFICANT PERMIT MODIFICATION                      ☐ ADMINISTRATIVE  
☒ MINOR PERMIT MODIFICATION                                      AMENDMENT

COMPANY NAME:	FACILITY ID: <b>S- 1114</b>
1. Type of Organization: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name:	
3. Agent to the Owner:	

**II. COMPLIANCE CERTIFICATION** (Read each statement carefully and initial all circles for confirmation):

- ☒ Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).
- ☒ Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.
- ☒ Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.
- ☒ Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

I declare, under penalty of perjury under the laws of the state of California, that the forgoing is correct and true:

  
Signature of Responsible Official

May 07, 2012  
Date

**Brad Elliott**

\_\_\_\_\_  
Name of Responsible Official (please print)

**General Manager, Operations – West Division**

\_\_\_\_\_  
Title of Responsible Official (please print)